

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
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**Withdrawal of Appearances by Karina** :   
**Velter in Various Open Cases, and Entry** : **Miscellaneous Case No: 21-205 CMB**  
**of Appearance of Replacement Counsel** :   
**Stephen R. Franks in Various Open** :   
**Cases** :   
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**OMNIBUS MOTION FOR LEAVE TO WITHDRAW AND SUBSTITUTE ATTORNEY**  
**IN VARIOUS PENDING CASES PURSUANT TO WDPA LBR 9010-2(g)**

TO THE HONORABLE CARLOTA M. BOHM  
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Manley Deas Kochalski, LLC respectfully moves this Court for an Order directing the Clerk of Courts for the Western Division of Pennsylvania, Bankruptcy Division, to substitute attorney Stephen R. Franks for attorney Karina Velter on the cases listed in Exhibit 1.

Respectfully submitted,

/s/Stephen R. Franks

Stephen R. Franks, Esquire (0075345)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Edward H. Cahill (0088985)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

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Attorneys for Creditor

The case attorney for this file is Stephen R. Franks.

Contact email is srfranks@manleydeas.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In re:**

**Withdrawal of Appearances by Karina Velter in Various Open Cases, and Entry of Appearance of Replacement Counsel Stephen R. Franks in Various Open Cases**

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**Miscellaneous Case No: 21-205 CMB**

**CERTIFICATE OF SERVICE OF OMNIBUS MOTION FOR LEAVE TO WITHDRAW  
AND SUBSTITUTE ATTORNEY IN VARIOUS PENDING CASES PURSUANT TO  
WDPA LBR 9010-2(g)**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on (date) March 3, 2021.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first class mail.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: March 3, 2021

By: /s/Stephen R. Franks

Signature

Stephen R. Franks, Esquire

Typed Name

P.O. Box 165028, Columbus, OH 43216-5028

Address

614-220-5611

Phone No.

0075345

List Bar I.D. and State of Admission

Stephen R. Franks, Attorney for Creditor, Manley Deas Kochalski LLC, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee,  
Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219 (notified by ecf)

**Notified by First class mail**

All Creditors on the attached Exhibit list at the address listed for “Creditor Notice Address”